## Annual 47 C.F.R. § 64.2010(e) CPNI Certification EB Docket 06-36

Annual 64.2010(e) CPNI Certification for 2012 covering the prior calendar year 2011

Date Filed: Feb 27, 2012

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C, 20554

Reference: Certification of CPNI Filing of Montana Sky Networks, Inc.

Name of company covered by this certification: Montana Sky Networks, Inc.

Name of signatory: Joseph Sullivan

Title of signatory: President/CEO

I, Joseph Sullivan, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seg. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI, unauthorized access to CPNI, or unauthorized disclosure of CPNI.

The company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Sign∉d:

Joseph Sullivan President/CEO

406-752-4335 x2000

Attachments: Accompanying Statement explaining CPNI procedures

CPNI Compliance Certification As Required by FCC Enforcement Bureau, DA 06-223 **EB.06-TC-060,** EB Docket **No. 06-36** Montana Sky Networks, Inc. FRN 0017769704

MONTANA SKY NETWORKS, INC. CERTIFICATION OF COMPLIANCE FOR THE 2010 CALENDAR YEAR

## **OPERATING PROCEDURES STATEMENT**

- Customer account prominently displays "CPNI" so that Customer Sales and Service Representatives (CSSRs) can readily identify customers opting to restrict use of their CPNI. When calls are received by CSSRs from customers with this preferred treatment they ask for customer permission to access account information.
- 2. Customers are given an opportunity to "opt-out" of CPNI usage beginning with the install of service. Additionally, customers may "opt-out" at any time.
- Notice regarding customer CPNI rights and Montana Sky's duty to protect CPNI is
  provided to all new and existing customers via the web site www.montanasky.net. In
  addition, the notice is also printed each month as a message on the customer's billing
  statement.
- Employees are trained on the proper use and/or disclosure of CPNI. Additionally
  procedures are documented and readily available to all employees on the company's
  internal website.
- Access to CPNI data is limited to employees and/or entities with proper authorization as allowed under Commission rules. All employees and/or entities with such access operate under policies and/or contract requiring nondisclosure of confidential information.
- 6. All marketing campaigns and materials are reviewed by a supervisory panel. This will include any use of CPNI data used in any given marketing effort. Please note that as of this time Montana Sky has not used CPNI data in this manner but the proper safeguards are in place should it be used.
- Improper use or disclosure of CPNI is subject to Montana Sky's work rules and disciplinary policies as outlined in its policy manual. The policy manual is readily accessible by all employees.

- 8. Valid Photo Identification is required when customers come into the Montana Sky office requesting assistance/access to any account information.
- 9. Call detail is only provided in a customer initiated call where the customer identifies the call record consistent with the FCC 07-22. Absent that information call detail will not be released during a customer initiated call. Montana Sky employees have been instructed to mail the detail to the address of record.
- Montana Sky does not currently, and has no plans to provide CPNI to a third party for the purposes of marketing.
- 11. Customer initiated changes in passwords or addresses result in a generic notification to the customer using the address of record consistent with FCC rules.